

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NATIONAL PRODUCTS INC.,

Plaintiff,

v.

ARKON RESOURCES, INC.,

Defendant.

CONSOLIDATED CASE

Lead Case No. 2:15-cv-01984-JLR

**STIPULATED MOTION AND
~~PROPOSED~~ ORDER FOR REVISED
SCHEDULE**

NOTED ON MOTION CALENDAR:
October 20, 2017

JURY TRIAL DEMANDED

Case No. 2:15-cv-01985-JLR

NATIONAL PRODUCTS INC.,

Plaintiff,

v.

HIGH GEAR SPECIALTIES INC.,

Defendant.

Case No. 2:15-cv-02024-JLR

NATIONAL PRODUCTS INC.,

Plaintiff,

v.

WIRELESS ACCESSORY
SOLUTIONS, LLC, d/b/a IBOLT –
WIRELESS ACCESSORY
SOLUTIONS, LLC.,

Defendant.

NATIONAL PRODUCTS INC.,
 Plaintiff,
 v.
 BRACKETRON, INC.,
 Defendant.

Case No. 2:16-cv-00109-JLR

Pursuant to LCR 10(g), Plaintiff National Products Inc. ("NPI") and defendants Arkon Resources, Inc. ("Arkon"), High Gear Specialties Inc. ("High Gear"), Wireless Accessory Solutions, LLC, d/b/a IBOLT – Wireless Accessory Solutions, LLC ("IBOLT"), and Bracketron, Inc. ("Bracketron") (collectively, "Defendants") jointly submit and respectfully request that the Court adopt the following revised proposed schedule to govern the above-captioned matter in light of the changes resulting from the Court's Claim Construction Order, entered on October 2, 2017 (Dkt. No. 96) and the Court's Orders granting the parties' motions for leave to amend their contentions (Dkt. Nos. 100, 103):

Event	Current Schedule (Dkt. No. 74)	Parties' Proposal
Document Production and Written Fact Discovery Deadlines	N/A	January 9, 2018
Reports from Expert Witnesses Under FRCP 26(a)(2)	December 1, 2017	February 2, 2018
Rebuttal Expert Reports Due	December 22, 2017	February 23, 2018
All motions related to discovery must be noted on the motion calendar pursuant to LCR 7(d)(3) or LCR 37(a)(2)	January 26, 2018	March 29, 2018
Discovery Complete	February 1, 2018	April 6, 2018

Good cause exists to modify the current schedule. NPI's deadline for serving Defendants with its amended infringement contentions is October 27, 2017, and Defendants'

1 deadline for serving NPI with their amended non-infringement and amended invalidity
2 contentions is November 10, 2017. *See* Dkt. Nos. 100, 103. Under the current schedule, the
3 deadline to exchange reports of the parties' expert witnesses under FRCP 26(a)(2) is
4 December 1, 2017. Dkt. No. 74. Good cause exists due to the proximity in time of the
5 deadlines for serving amended contentions and for serving opening expert reports, as the
6 parties' experts need to consider the amended contentions prior to forming opinions that are
7 subject of the expert reports. The parties may also need to take additional discovery based
8 on the amended contentions, including for example, discovery regarding any new prior art
9 disclosed in the amended contentions. Additionally, counsel for NPI and counsel for Arkon,
10 IBOLT and High Gear will be in trial beginning on November 13, 2017 for the case,
11 *National Products Inc. v. Arkon Resources, Inc.*, No. 2:15-cv-01553 (W.D. Wash.), filed on
12 September 30, 2015 in the United States District Court for the Western District of
13 Washington and assigned to Judge Robert S. Lasnik.

14 Accordingly, due to the condensed schedule and the parties' scheduling conflicts in
15 the coming months, the parties believe that good cause exists to modify the current schedule
16 as provided above.

17
18 Respectfully submitted this 20th day of October, 2017.

19
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ORDER

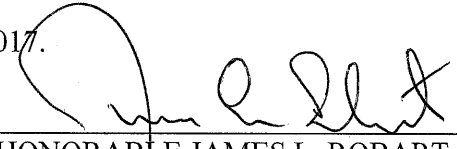
This matter is before the Court on the parties' Stipulated Motion for Revised Schedule ("the Stipulated Motion"). The Court, having considered this matter and the record in this case, ORDERS as follows:

The Stipulated Motion is GRANTED in its entirety.

IT IS HEREBY ORDERED THAT the following schedule of deadlines is in effect:

Event	Deadline
Document Production and Written Fact Discovery Deadlines	January 9, 2018
Reports from Expert Witnesses Under FRCP 26(a)(2)	February 2, 2018
Rebuttal Expert Reports Due	February 23, 2018
All motions related to discovery must be noted on the motion calendar pursuant to LCR 7(d)(3) or LCR 37(a)(2)	March 29, 2018
Discovery Complete	April 6, 2018

SO ORDERED this ²⁰22 day of October, 2017.


HONORABLE JAMES L. ROBART
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of October 2017, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record for the Parties in the above-captioned litigation.

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STIPULATED MOTION FOR REVISED SCHEDULE -
Case Nos. 2:15-cv-01984-JLR,
2:15-cv-01985-JLR, 2:15-cv-02024-JLR,
2:16-cv-00109-JLR - Pg. 6

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